



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Subject Removal of Confidential Business Information (CBI) from File

From Evelyn Sorto

To Memo To File (FIFRA Case No F 16-135)

**JUL 20 2016**

To Whom It May Concern

On Wednesday July 20 2016 I removed confidential business information (CBI) from the "Aqua Chempacs LLC inspection file (FIFRA Case No F 16 135) The file included a pesticide production log dated September 15 2015 (Exhibit 2) and a Pesticide Report for Pesticide Producing and Device Producing Establishments" form (EPA Form 3540 16, Exhibit 1, 2 pages) I redacted and made a copies of the records for the file The original records containing the CBI will be shredded The CBI was removed in order to submit the case file to the Records Room

A handwritten signature in cursive script, appearing to read "Evelyn Sorto", is written over a horizontal line.

Evelyn Sorto  
Compliance Officer



Pesticide/Asbestos Programs and Enforcement Branch  
Enforcement Case Screening and Recommendation  
Worksheet  
(Enforcement Confidential Do Not Release Under FOIA)

**INSTRUCTIONS** In response to a detected violation or set of detected violations EPA enforcement staff may find completion of this checklist useful in prioritizing cases for formal enforcement action Even if a violator has received or requested compliance assistance the violations may still merit the initiation of a formal enforcement action

File Name Aqua Chempacs Facility EPA Est No 88326 PA 1 Address 515 Andrews Road Trevose PA 19053 Contractor Name Address City State Zip Code	File Number F 16 135  Inspection Date September 15 2015  Violation Date  Projected Quarter	Inspector Christopher Santore and Daniel Duer (PDA)  Case Reviewer Evelyn Sorto  ORC Contact	Statute <input checked="" type="checkbox"/> <b>FIFRA</b> <input type="checkbox"/> CAA NESHAP <input type="checkbox"/> TSCA AHERA <input type="checkbox"/> TSCA ASHARA <input type="checkbox"/> TSCA MAP
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Were any violations observed during inspection/case review? Yes (continue) ☒ No (close out)

**Inspection Summary**

*Summarize key issues and violations found in the inspection report(s) Include the names addresses and telephone numbers of EPA and State inspectors that participated in the inspection In FIFRA cases where there were no state or federal inspections describe how evidence was gathered and how violations were determined (Attach copies of all relevant inspection reports) Self Disclosure? ☐ Yes ☒ No*

On September 15 2015 Inspectors Christopher Santore and Daniel Duer performed a producer establishment inspection at Aqua Chempacs (EPA Est No 88326 PA 1) in Trevose PA The inspectors met with Mr Steve Seneca (President/CEO) Mr Joe Solitro (Marketing Director) and Ms Iryna Bortnytska (Research and Development) The inspectors collected labels for Aqua Chempacs Disinfectant Cleaner' (EPA Reg No 1839 176 88326) Neutral Disinfectant Cleaner' (EPA Reg No 1839 176 8847) Clean Cut Solutions Disinfectant Cleaner' (1839 176 88477) Neutro Quat Neutral Disinfectant Cleaner (EPA Reg No 1839 176 89885) and Water Soluble Paks Neutral Disinfectant Cleaner' (EPA Reg No 1839 176 91643) They also collected a production log and a copy of the company s Section 7 Report

**Detailed Description of Violations**

*List each alleged violation citing the applicable statute and/or regulation Describe how each violation was determined List in detail the information in our possession that supports the fact that a violation(s) has occurred Discuss in detail how the statute and/or regulations in question are applicable to the alleged violator For example does the violator/facility meet the definition of facility does the case meet any threshold requirements for there to be a violation etc ) Discuss how the alleged violation(s) are not subject to applicable exclusions found in the regulations or applicable policy Describe whether there has been an actual exposure to or is there a substantial likelihood of exposure to pesticides/ asbestos that resulted from or may result from action taken or not taken by the alleged violator Are the violation(s) continuing? Identify the source(s) of this information (Attach copies of supporting documentation)*

N/A

**Compliance History**

*Provide a description of the compliance history of the violator or facility including repeat violations Describe instances of non-compliance with FIFRA CAA or TSCA activities Also describe instances of non FIFRA CAA or TSCA non compliance if there is a relevant link between the FIFRA CAA or TSCA and non FIFRA CAA or TSCA non compliance*

N/A

**Ownership Information**

*Provide information that supports that the party being cited for violations is the proper entity to receive the proposed enforcement action This may include information on the facility ownership The correct names of the contractors involved or other relevant information (D&B reports and deed and title search information may be providing this information)*

N/A

Pesticide/Asbestos Programs and Enforcement Branch Enforcement Case Screening and Recommendation Worksheet (Enforcement Confidential Do Not Release Under FOIA)	
<b>Financial Status of Facility Owner/Operator</b> <i>Provide a brief description of the violator(s) financial status as currently available. This can be obtained through responses to information requests, Dun &amp; Bradstreet reports, etc. (Attach copies of supporting information)</i> N/A	
<b>Other Considerations</b> <i>Provide a brief description. Are there any apparent knowing, willful or negligent conduct by the company or any individual employed by the company?</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>Are there known or suspected violation(s) of other regulatory requirements?</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>Does this case have multi media potential?</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Penalty Calculation and Justification</b> <i>List, for each violation, a proposed penalty for that violation. Provide a brief narrative on how this penalty amount was determined and what assumptions and judgments regarding the evidence and the severity of the violation(s) were made? Include an economic benefit component if appropriate. (Attach penalty calculation sheets)</i> <div style="text-align: center; font-size: 2em; color: red; font-weight: bold; padding: 10px;">           (b) (5) (b) (5)         </div>	
<b>Penalty Only/Injunctive Relief</b> <i>Is this a penalty only case or are there specific tasks that must be completed by the violator for the facility to return to compliance. Please describe</i> N/A	
<b>15 What is the recommended enforcement response?</b>  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Advisory Letter  <input type="checkbox"/> AO  <input type="checkbox"/> APO  <input checked="" type="checkbox"/> Close  <input type="checkbox"/> Criminal Referral  <input type="checkbox"/> Judicial Referral           </div> <div style="width: 45%;">             NOV/NOW/NON  <input type="checkbox"/> SSURO  <input type="checkbox"/> Refer to State  <input type="checkbox"/> Refer to Other Region  <input type="checkbox"/> Other  <input type="checkbox"/> Show Cause/Super CAFO           </div> </div>	<b>Notes</b>  
Case Reviewer Evelyn Sorto <i>Evelyn Sorto</i>	Date 6/7/16
Enforcement Coordinator Kyla Townsend <i>KLT</i>	Date 06/20/2016
Branch Chief Fatima El Abdaoui <i>Fatima El Abdaoui</i>	Date 06/22/2016

1. This is a pre decisional document protected by the deliberative process and attorney work product privileges (and may also be privileged attorney client communication). Conclusions or recommendations are intended solely as primary information for government personnel. This worksheet contains tentative conclusions and staff level recommendations and does not create any rights or procedural or defenses as they are not binding on the Agency or Department of Justice.

*JB*  
*rec*  
*2/25/16*

Pesticide Establishment Inspection – Aqua Chempacs LLC

Establishment Name    Aqua Chempacs LLC  
515 Andrews Rd  
Trevose PA 19053

Date of Inspection     September 15th 2015  
Inspectors               Chris Santore Sr    Region 3  
Daniel Duer    Region 7

Company Information

Company Name         Aqua Chempacs LLC  
Responsible Person     Mr Steve Seneca    President    CEO

Participants in Inspection

Company                 Mr Steve Seneca    President    CEO  
Mr Joe Solitro    Marketing Director  
Ms Iryna Bortnytska    Research and Development  
State                      Mr Chris Santore Sr    Agronomic Products Inspector  
Mr Daniel Duer    Plant Industry Technician

#### Inspector Narrative – Aqua Chempacs LLC

On September 15th 2015 Daniel Duer Plant Industry Technician Region 7 and I conducted an announced Pesticide Establishment Inspection at the location of Aqua Chempacs LLC Trevoze PA This inspection was announced so the most responsible person on site would be present and available At the time of this inspection we met with Mr Steve Seneca President and CEO for the firm along with Mr Joe Solitro Marketing Director and Ms Iryna Bortnytska Research and Development All company representatives were presented with my EPA Credentials and Daniel Duer's state photo id all individuals were issued Notice of Inspection s

Mr Seneca stated that the firm s building size has a total square footage of 13 000ft with that being broken down to the following production area 1 500 sq ft warehouse 9 000 sq ft and Office area 2 500 sq ft The firm s workforce consists of 17 full time and 7 part time employees The firm s gross sales for year 2014 were approximately 5 million dollars with pesticide sales being approximately 3% of the total revenue The firm filed the EPA Production Report on February 2<sup>nd</sup> 2015 (exh 1) Mr Seneca stated that his firm has their own product Aqua Chempacs Disinfectant Cleaner (exh 3) production log dated August 13<sup>th</sup> and 18<sup>th</sup> provided (exh 2) and private labels for three additional companies These companies are as follows,Clean Cut Solutions (exh 4) K & K (exh 5) and Excalibur (exh 6)

At this time I asked Mr Seneca if his firm repackages the pesticide products Mr Seneca stated that his company was a co formulator Mr Seneca stated that he is in agreement with Simoniz which is located in Bolton Ct They produce the material,send it to him in 275 gallon totes and it is put into water soluble packets The firm maintains batch samples for a three year period The company also maintains records for production and a complaint file all records are maintained for three years The firm does not give or receive any guarantees nor do they export or import products

The firm s products are shipped via UPS with the shipping invoice used for records All the 275 gallon totes are returned to Simoniz after product has been packaged into the soluble packets Any damaged product which is returned is reincorporated into the batch that is being packaged at that time The products are date coded with the year Julian date and the number of the machine which packaged that run The batch number for the sample obtained during this inspection was 52451 5 representing the year 2015 245 the day of the year and 1 representing machine number 1 At this time I asked Mr Seneca if he had any additional questions or concerns he said no and the inspection was concluded

Respectfully



Chris Santore Sr

Agronomic Products Inspector Reg III



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF INSPECTION

ADDRESS (EPA Regional Office)

Arch St  
Phila Pa

DATE

09/15/15

HOUR

10 45

A M  
P M

NAME OF INDIVIDUAL

Steve Seneca

TITLE

President and CEO

FIRM NAME

Aqua Chempacs LLC

(215) 630 5578

FIRM ADDRESS (Number Street City State and ZIP Code)

515 Andrews Rd  
Trevose, Pa 19053

SIGNATURE OF EPA EMPLOYEE

Chris Santoro / Daniel Nunez

TITLE

Anonymous Product Inspector

REASON FOR INSPECTION

FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED LABELED AND RELEASED FOR SHIPMENT AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES IN PLACES WHERE THE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec 9(a) and 12(a)(2)(B)); AND FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169 (Sec 8 and 12(a)(2)(B))

VIOLATION SUSPECTED

Pesticide Establishment Inspection

Section 8 9(a) and 12(a)(2)(B) of the Federal Insecticide Fungicide and Rodenticide Act as amended (7 U.S.C. 136 et seq) are quoted on the reverse of this form

EPA FORM 3540-2 (Rev 01-01)

PREVIOUS EDITION MAY BE USED  
UNTIL SUPPLY IS EXHAUSTED

- 1 Original ESTABLISHMENT COPY
- 2 SAMPLE RECORD COPY
- 3 REGION COPY
- 4 INSPECTOR'S COPY

Sec 8 [136f] Books and Records

(b) Inspection

For the purposes of enforcing the provisions of this Act any producer distributor carrier dealer or any other person who sells or offers for sale delivers or offers for delivery any pesticide or device subject to this Act shall upon request of any officer or employee of the Environmental Protection Agency or of any State or political subdivision duly designated by the Administrator furnish or permit such person at all reasonable times to have access to and to copy

(1) all records showing the delivery movement or holding of such pesticide or device including the quantity the date of shipment and receipt and the name of the consignor and consignee or

(2) in the event of the inability of any person to produce records containing such information all other records and information relating to such delivery movement or holding of the pesticide or device Any inspection with respect to any records and information referred to in this subsection shall not extend to financial data sales data other than shipment data pricing data personnel data and research data (other than data relating to registered pesticides or to a pesticide for which an application for registration has been filed) Before undertaking an inspection under this subsection the officer or employee must present to the owner operator or agent in charge of the establishment or other place where pesticides or devices are held for distribution or sale appropriate credentials and a written statement as to the reason for the inspection including a statement as to whether a violation of the law is suspected If no violation is suspected an alternate and sufficient reason shall be given in writing Each such inspection shall be commenced and completed with reasonable promptness

Sec 9 [136g] Inspection of Establishments Etc

(a) In General

(1) For purposes of enforcing the provisions of this Act officers or employees of the Environmental Protection Agency or of any State duly designated by the Administrator are authorized to enter at reasonable times

(A) any establishment or other place where pesticides or devices are held for distribution or sale for the purpose of inspecting and obtaining samples of any pesticides or devices packaged labeled and released for shipment and samples of any containers or labeling for such pesticides or devices or

(B) any place where there is being held any pesticide the registration of which has been suspended or canceled for the purpose of determining compliance with section 19

(2) Before undertaking such inspection the officers or employees must present to the owner operator or agent in charge of the establishment or other place where pesticides or devices are held for distribution or sale appropriate credentials and a written statement as to the reason for the inspection including a statement as to whether a violation of the law is suspected If no violation is suspected an alternate and sufficient reason shall be given in writing Each such inspection shall be commenced and completed with reasonable promptness If the officer or employee obtains any samples prior to leaving the premises the officer or employee shall give to the owner operator or agent in charge a receipt describing the samples obtained and if requested a portion of each such sample equal in volume or weight to the portion retained If an analysis is made of such samples a copy of the results of such analysis shall be furnished promptly to the owner operator or agent in charge

Sec 12 [136j] Unlawful Acts

(a) In General

(2) It shall be unlawful for any person --


(A) to detach alter deface or destroy in whole or in part any labeling required under this Act

(B) to refuse to --

(i) prepare maintain or submit any records required by or under section 5 7 8 11 or 19

(ii) submit any reports required by or under section 5 6 7 8 11 or 19 or

(iii) allow any entry inspection copying of records or sampling authorized by this Act

 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY <b>NOTICE OF INSPECTION</b> <i>Joseph Sotelo</i>		ADDRESS (EPA Regional Office) Arch St Phila PA DATE: 09/15/15    HOUR: 10 45    A M P M	
NAME OF INDIVIDUAL <i>Joe Sotelo</i>		TITLE <i>Marketing Director</i>	
FIRM NAME <i>Agua Chem Pcs, LLC</i> <i>(215) 396-7200 ext 302</i>		FIRM ADDRESS (Number Street City State and ZIP Code) <i>515 Andrews Rd</i> <i>Trevose, PA 19053</i>	
SIGNATURE OF EPA EMPLOYEE <i>Ch. Santos</i>		TITLE <i>Agreements Products Inspector</i>	
REASON FOR INSPECTION FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED LABELED AND RELEASED FOR SHIPMENT AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES IN PLACES WHERE THE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec 9(a) and 12(a)(2)(B)) AND FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169 (Sec 8 and 12(a)(2)(B))			
VIOLATION SUSPECTED <i>Pesticide Establishment Inspection</i>			
Section 8 9(a) and 12(a)(2)(B) of the Federal Insecticide Fungicide and Rodenticide Act as amended (7 U S C 136 et seq) are quoted on the reverse of this form			



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<p>DATE 8/15/15</p>		<p>HOUR 10 45 AM</p>	
<p>NAME OF INDIVIDUAL Iryna Bortnytska</p>		<p>TITLE Research &amp; Development</p>	
<p>FIRM NAME Aqua Chemicals LLC (215) 396-7200</p>		<p>FIRM ADDRESS (Number Street City State and ZIP Code) 515 Andrews Road Trevose PA 19053</p>	
<p>SIGNATURE OF EPA EMPLOYEE <i>[Signature]</i></p>		<p>TITLE Agricultural Products Inspector</p>	
<p>REASON FOR INSPECTION</p> <p>FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED, LABELED AND RELEASED FOR SHIPMENT AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES IN PLACES WHERE THE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec 9(a) and 12(a)(2)(B)) AND FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169 (Sec 8 and 12(a)(2)(B))</p>			
<p>VIOLATION SUSPECTED</p> <p>Pesticide Establishment Inspection</p>			
<p>Section 8 9(a) and 12(a)(2)(B) of the Federal Insecticide Fungicide and Rodenticide Act as amended (7 U.S.C. 136 et seq) are quoted on the reverse of this form</p>			

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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES

ADDRESS (EPA Regional Office)

Arch St  
Phila Pa

DATE

09/15/15

NAME OF INDIVIDUAL

Steve Seneca

TITLE

President and CEO

FIRM NAME

Agua Chemics, LLC

FIRM ADDRESS (Number Street City State and ZIP Code)

515 Andrews Rd  
Trevose Pa 19053

SAMPLE NUMBERS

SN 16-03-CAS-4 sub 2

SAMPLES COLLECTED (Describe fully List Registration Lot Batch Model Serial Numbers and other positive identification)

The following samples were collected by the U S Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide Fungicide and Rodenticide Act as amended (7 USC 136g) This section is quoted on the reverse of this form

Sample 70FD 2 PLASTIC container labeled Agua Chemics  
Disinfectant Cleaner with Active Ingredients Octyl decyldimethyl ammonium  
chloride 15 24% Diethyl dimethyl ammonium chloride 762%  
D decyl dimethyl ammonium chloride, 762% Active dimethyl benzyl  
ammonium chloride 20 32% Inert Ingredients 45 26% \*\*\*  
Lot # 52451 \*\*\* EPA Reg No 1839-176-88326 EPA EST No 88326-  
PA-001 \*\*\* Agua Chemics, LLC 515 Andrews Rd Trevose Pa  
19053 • 215-356 7200

ACKNOWLEDGEMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged labeled and released for shipment

SIGNATURE (Owner Operator or Agent)

[Signature]

TITLE (Owner Operator or Agent)

President CEO

☒ DUPLICATE SAMPLES  
REQUESTED AND PROVIDED

☐ DUPLICATE SAMPLES  
NOT REQUESTED

SAMPLES WERE  
N/C

☐ PURCHASED

☐ BORROWED

AMOUNT PAID FOR SAMPLES

\$

[Signature]

☐ CASH

☐ VOUCHER

☐ TO BE BILLED

☒ NO CHARGE

NAME OF COLLECTOR (print or type)

Chris Santore Sr

TITLE OF COLLECTOR

Agromia Products  
Fugate

SIGNATURE OF COLLECTOR

[Signature]

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ESTABLISHMENT INSPECTION REPORT				1 VISIT NO 85163	
2 REGION NO 7		3 INSPECTOR NO 10169		4 DATE OF VISIT 09/15/15	
5 ESTAB REGISTRATION NO 88326-PA-001					
6 ESTABLISHMENT NAME AND ADDRESS (Including Street City State ZIP code county and phone number) Agua Chempro, LLC 515 Andrews Rd Trevose, Pa 19053 (215) 396-7200				7 RELATED FIRMS nu	
8 TYPE OF ESTABLISHMENT Co Formulation		9 TYPE OF OWNERSHIP LLC		10a TOTAL ANNUAL SALES 5 million	
				10b PERCENT PESTICIDES 3	
11 NAMES AND TITLES OF OF PRINCIPAL OFFICERS PARTNERS OR OWNERS MR STEVEN Seneca - President And CEO MR William Corra - INVESTOR MR Mitchel spurlock - INVESTOR MR Bill Paris - CEO					
12 PERSONS INTERVIEWED (Give name title phone number and responsibility) MR STEVEN Seneca - President And CEO MR Joe Soltra - Marketing Director MS Inyana Bortnytska - Research & Development					
13a PHYSICAL SAMPLES COLLECTED		13b DOCUMENTARY SAMPLES		13c LABELS REVIEWED WITHOUT SAMPLES	
EPA REGISTRATION NO	SAMPLE NO	EPA REGISTRATION NO	SAMPLE NO	EPA REGISTRATION NO	
1839-176-88326	16-03-1054			1839-176-88477	
				1839-176-89885	
				1839-176-91643	
14 REMARKS					
15 SIGNATURE OF INSPECTOR			16 INSPECTOR'S STATION		
[Signature]			Tunkhannock Pa III		

API 362		<b>PDA/BPI PESTICIDE COLLECTION REPORT</b>		<b>SAMPLE NO (FY REG II NO)</b> 16-03 CAS 04 Sub 1	
DATE COLLECT 91515	PROJ CODE	TYPE SAMPLE physical	REGISTRATION NO 189 176 88326	ESTABLISHMENT NO 88326 PA 001	
DATE(S) SHIPPED		LABEL REVIEW			
PRODUCT IDENTIFICATION (Name Brand Q C Statement Active Ingredients Firm Name and Address etc) Sub IDFD AQUA CHEMPACS Disinfectant Cleaner*ACTIVE INGREDIENTS Octyl decyl dimethyl ammonium chloride 15 24/ Dioctyl dimethyl ammonium chloride 7 62/ Didecyl dimethyl ammonium chloride 7 62/ Alkyl dimethyl benzyl ammonium chloride 20 32/ INERT INGREDIENTS* 49 20/ TOTAL 100/**KEEP OUT OF REACH OF CHILDREN***DANGER***EPA Reg No 1839 176 88326 EPA Est No 88326 PA 001***Net Contents 10 23 ounces AQUA CHEMPACS LLC 515 Andrews Rd Trevoise PA 19053 215 396 7200 www.aquachempacs.com					
PRODUCER ESTABLISHMENT					
Aqua Chempacs LLC					
STREET ADDRESS 515 Andrews Road		CITY Trevoise	STATE PA	ZIP CODE 19053	
SHIPPER					
STREET ADDRESS		CITY	STATE	ZIP CODE	
DEALER/COMPLAINANT/APPLICATOR					
STREET ADDRESS		CITY	STATE	ZIP CODE	
RECORDS AND SAMPLE SENT TO					
ORIGINAL RECORDS Pa Dept of Agriculture Bureau of Plant Industry Harrisburg PA 17110		SAMPLE Mr Len Brylewski			
SAMPLE DELIVERED TO Pa dept of Agriculture Bureau of Industry Harrisburg PA 17110 by Quick Courier		DATE 09/18/15	B/L NO		
LOT OR CODE NUMBERS 052451	RELATED SAMPLES FROM SAME SHIPMENT OR PRODUCER ESTABLISHMENT none				
AMOUNT BEFORE SAMPLING 13 10 23 oz plastic containers labeled Aqua Chempacs Disinfectant Cleaner					
DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION sample obtained from a previously opened cardboard box labeled Aqua Chempacs Disinfectant Cleaner containing 13 10 23 Oz Plastic containers labeled Aqua Chempacs disinfectant cleaner lot # 52451 Product was located in warehouse area of company at time of sampling					
SAMPLE PREPARED IN THE FOLLOWING MANNER Sample IDFD 16 03 CAS 4 Sub1 09/15/15 CAS sub polybagged and sealed with PDA Seal IDFD 16 03 CAS-4 Sub 1 09/15/15 CAS					
REASON FOR COLLECTION Producer Establishment Inspection					
REMARKS NI issued to and signed by Mr Steve Seneca Pres and CEO Aqua Chempacs dated 09/15/15 NI issued to and signed by Mr Joe Solitro mkt dir Aqua Chempacs dated 09/15/15 NI issued to and signed by Ms Iryna Bortnytska R&D Aqua chempacs dated 09/15/15 RS issued to and signed by Mr Steve Seneca Pres and CEO Aqua chempacs dated 09/15/15 Establishment Inspection Report exhibits 1 thru 6 photo exhibits 1 thru 8					
SAMPLE COST N/C	INSPECTOR NUMBER 10169	COLLECTOR'S NAME (Type) AND SIGNATURE Chris Santoro Sr 			

09/15/15 JS Eth 1

		United States		OMB Control No 2070-0078 Expires on 3/31/2016	
		<b>ENVIRONMENTAL PROTECTION AGENCY</b>			
Washington, DC 20460					
<b>Pesticide Report for Pesticide Producing and Device Producing Establishments</b>					
Office of Enforcement and Compliance Assurance					
Section 7 Federal Insecticide Fungicide and Rodenticide Act (7 U.S.C. sec 136e)					
<a href="http://www2.epa.gov/compliance/pesticide-establishment-registration-and-reporting">http://www2.epa.gov/compliance/pesticide-establishment-registration-and-reporting</a>					
1 Establishment Name		Aquachempacs LLC		2 EPA Est No	88326 PA 001
3 Establishment Site Address 515 Andrews Road					
4 City Trevoze				5 State PA	
6 Province/Region		7 Country	USA	8 Zip/Postal Code 19053	
9 Establishment Mailing Address Aquachempacs LLC					
10 City Trevoze				11 State PA	
12 Province/Region		13 Country	USA	14 Zip/Postal Code 19053	
15 Telephone Number 215 396 7200		16 eMail bill@chempacs.com			
17 Check if your establishment's name or address changed <input type="checkbox"/>		18 Did you produce or distribute in 2014? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
19 Company Name Aquachempacs LLC					
20 Company Site Address 515 Andrews Road					
21 City Trevoze				22 State PA	
23 Province/Region		24 Country	USA	25 Zip/Postal Code 19053	
26 Company Mailing Address 515 Andrews Road					
27 City Trevoze				28 State PA	
29 Province/Region		30 Country	USA	31 Zip/Postal Code 19053	
32 Telephone Number		33 eMail			
34 Check if your company name or address changed <input type="checkbox"/>		35 Check if your Authorized Agent changed <input type="checkbox"/>			
36 Name of Company Official or Authorized Agent William Paris			37 Title of Company Official or Authorized Agent CFO		
38 Signature of Company Official or Authorized Agent (Original signature required)				39 Date 02 13 2015	
EPA Reviewer	EPA Office	Post Mark Date	Date Entered	Comments	Reporting Year <b>2014</b>





United States  
**ENVIRONMENTAL PROTECTION AGENCY**

OMB Control No. 2070-0078  
Expires on 3/31/2016

Washington, DC 20460

**Pesticide Report for Pesticide Producing and Device Producing Establishments**

Office of Enforcement and Compliance Assurance

Section 7 Federal Insecticide Fungicide and Rodenticide Act (7 U.S.C. sec. 136e)  
<http://www2.epa.gov/compliance/pesticide-establishment-registration-and-reporting>

Establishment Name Aquachempacs LLC

EPA Est No 88326 - PA - 001

**Pesticide Production Information**

40 Product Code	1	(If 6 attach formulation per instructions)	41 EPA Product Registration No	1839 176 88326
42 Product Name	Disinfectant Cleaner			43 Product Classification
44 Product Type	3	45 Market Sold To	1	46 RUP Status 2
47 Unit of Measurement				
48 Amount Produced Repackaged or Relabeled	[2014]			
49 Amount Sold or Distributed U S	[2014]			
50 Amount Sold or Distributed Foreign (Foreign establishments enter 0 )	[2014]			
51 Amount To Be Produced Repackaged or Relabeled in	[2015]			
40 Product Code	(If 6 attach formulation per instructions)		41 EPA Product Registration No	
42 Product Name				43 Product Classification
44 Product Type		45 Market Sold To		46 RUP Status
47 Unit of Measurement				
48 Amount Produced Repackaged or Relabeled	[2014]			
49 Amount Sold or Distributed U S	[2014]			
50 Amount Sold or Distributed Foreign (Foreign establishments enter "0" )	[2014]			
51 Amount To Be Produced Repackaged or Relabeled in	[2015]			
40 Product Code	(If 6 attach formulation per instructions)		41 EPA Product Registration No	
42 Product Name				43 Product Classification
44 Product Type		45 Market Sold To		46 RUP Status
47 Unit of Measurement				
48 Amount Produced Repackaged or Relabeled	[2014]			
49 Amount Sold or Distributed U S	[2014]			
50 Amount Sold or Distributed Foreign (Foreign establishments enter 0 )	[2014]			
51 Amount To Be Produced Repackaged or Relabeled in	[2015]			
40 Product Code	(If 6 attach formulation per instructions)		41 EPA Product Registration No	
42 Product Name				43 Product Classification
44 Product Type		45 Market Sold To		46 RUP Status
47 Unit of Measurement				
48 Amount Produced Repackaged or Relabeled	[2014]			
49 Amount Sold or Distributed U S	[2014]			
50 Amount Sold or Distributed Foreign (Foreign establishments enter 0 )	[2014]			
51 Amount To Be Produced Repackaged or Relabeled in	[2015]			

Production log

09/15/13  
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Chempac csv log

Type	Date	Inven #	Description	Quan Produced	Hours	Mach #
→		81315 2_41	Indiv Disinfectant Qt ACP 3gr			
		81315 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		81715 2_70	Indiv Glass Cleaner Pac (3 gr)			
		81715 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		81715 2_18	Indiv Carpet Pre Spot (12 gr)			
		81715 2_641	Indiv HD Fir Lavender GS/DFE 15gm			
		81815 2_70	Indiv Glass Cleaner Pac (3 gr)			
→		81815 2_41	Indiv Disinfectant Qt ACP 3gr			
		82015 2_1557	Indiv HD Floor Pac (8 gr)			
		82015 2_16	Indiv Fresh Scent Pac (12 gr)			
		82015 2_12	Indiv Neutral Floor Pac 15Gr			
		82015 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		82015 2_3	Indiv Laundry Det Pac (15 Gr)			
		82015 2_1557	Indiv HD Floor Pac (8 gr)			
		82015 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		82115 2_1557	Indiv HD Floor Pac (8 gr)			
		82115 2_12	Indiv Neutral Floor Pac 15Gr			
		82115 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		82115 2_1557	Indiv HD Floor Pac (8 gr)			
		82415 2_1557	Indiv HD Floor Pac (8 gr)			
		82415 2_12	Indiv Neutral Floor Pac 15Gr			
		82415 2_1404	Indiv OS1 #102 APC green 4GM			
		82415 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		82415 2_1557	Indiv HD Floor Pac (8 gr)			
		82515 2_1557	Indiv HD Floor Pac (8 gr)			
		82515 2_97	Indiv AutoScrub DFE Lavender 22 5gm			
		82515 2_1557	Indiv HD Floor Pac (8 gr)			
		82515 2_1557	Indiv HD Floor Pac (8 gr)			
		82615 2_12	Indiv Neutral Floor Pac 15Gr			
		82615 2_1557	Indiv HD Floor Pac (8 gr)			
		82615 2_1557	Indiv HD Floor Pac (8 gr)			
		82615 2_1557	Indiv HD Floor Pac (8 gr)			



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Cleaner Disinfectant Detergent Deodorant Approved  
Kills Pandemic 2009 H1N1 Influenza A Virus (H1N1) Strains at 4-13 min, Jan 02, 2015

**ACTIVE INGREDIENTS**  
Sodium hypochlorite 15.24%  
Dibenzyl dimethyl ammonium chloride 7.62%  
Alcohol (50% C14, 40% C12, 10% C10) 20.32%  
Dibenzyl dimethyl ammonium chloride 100.00%  
TOTAL 100.00%

**KEEP OUT OF REACH OF CHILDREN**

**ANGER**

See label panel for additional precautionary statements  
EPA Reg. No. 1639-178 88477  
EPA Sec. No. 38206-PH-001  
Net Contents: 10.23 quarts, 100 Wash-Solutions Products  
each containing 0.1023 ounces of product.



Distributed by  
16 Meredith Circle Needham MA 02462 781 382 4707  
www.CleanSolutions.com

**DIRECTIONS FOR USE**  
This is a solution of Federal Law to use the product in a manner from a state with its location. The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.

The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.

Apply to surface with 10 minutes. Then remove excess liquid. Dry by air or cloth. Do not use. The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.

The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.

**PERSONAL PROTECTION FROM EXPOSURE AND DECONTAMINATION AGAINST NEW HAV AND NEW YORK STRAINS OF SARS-CoV-2**  
The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.

The product is a disinfectant designed to prevent the spread of disease, including influenza, and disinfectant for use in schools, hospitals, and other facilities. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces. The product is designed to be used on a variety of surfaces, including hard surfaces, and is not intended for use on soft surfaces.



# Clean Cut Solutions Disinf Film Print

**APPROVED**

By Stepan at 8 14 am May 29 2015

## NEUTRAL DISINFECTANT CLEANER

### ACTIVE INGREDIENTS

Octyl decyl dimethyl ammonium chloride	15.24%
Dioctyl dimethyl ammonium chloride	7.62%
Dodecyl dimethyl ammonium chloride	7.62%
Alkyl (50% C14 40% C12 10% C16) dimethyl benzyl ammonium chloride	20.32%
INERT INGREDIENTS	49.20%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

### DANGER CORROSIVE

See container label for additional  
precautionary statements and use directions

EPA Reg. No. 1839-178-88477

EPA Est. No. 88326 PA 001

Dist. by Clean Cut Solutions

16 Meredith Circle Needham MA 02492

Add 1 packet to 2 gallons of water

Net Contents 0.6178 ounce

NEUTRAL  
DISINFECTANT CLEANER  
Quaternary Ammonium Chlorides  
KEEP OUT OF REACH OF CHILDREN  
DANGER CORROSIVE

See outer container for  
Precautions and Directions  
EPA Reg. No. 1839-178-88477

09/15/15  
CS

# NEUTRO QUAT

By Stoppan 18 28 am Jun 02 2016

**ACTIVE INGREDIENTS**

100.00%	20.32%
7.62%	7.62%
15.24%	15.24%
50.00%	50.00%
100.00%	100.00%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

See side panel for additional precautionary statements

EPA Reg No 1639-176-89895  
EPA Est No 66326 PA 001

Net Contents: 4 092 ounces, 40 Water Soluble Packets  
each containing 0.1023 ounces of product.

Sold by K & K Chemical PO Box 737

NOTE TO PHYSICIAN  
Prohibit maxillofacial damage may compromise the use of  
gastric biopsy. PP 8272  
Key TX 75169 For Reorder Call 800 327-0541

[illegible][illegible]

**PESTICIDE DISPOSAL.** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray material, or empty containers is a violation of Federal law. If these wastes cannot be disposed of by the second step in below, the following instructions must be followed:

1. If the pesticide label states that the pesticide is extremely toxic (e.g., diazinon), it is extremely hazardous waste (P001) and must be managed under RCRA. Contact your State Department of Environmental Control Agency for the hazardous waste management system at the nearest EPA Regional Office.

[illegible][illegible][illegible]

**KEEP OUT OF REACH OF CHILDREN.** Contains acid borne an irritant. Avoid contact with skin, eyes, nose, mouth, and clothing. Avoid breathing vapors. Wash thoroughly with soap and water after handling and before eating or drinking. If swallowed: Rinse mouth immediately with water. Do not induce vomiting. If inhaled: Get fresh air. If irritation occurs: Get medical attention. For more information call 1-800-424-9293. See back of container for complete first aid instructions. **DO NOT COMBUSTION. NEVER FLOOD.** Ignited by STORAGE ON DISPOSAL. **HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS** **DANGER** **PERFECTLY STABLE.** Stable in a dry place to below 100 degrees Fahrenheit. **STORAGE AND DISPOSAL** **DO NOT COMBUSTION. NEVER FLOOD.** Ignited by STORAGE ON DISPOSAL. **HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS** **DANGER** **PERFECTLY STABLE.** Stable in a dry place to below 100 degrees Fahrenheit.

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**SPECIAL INSTRUCTIONS FOR EXAMING AND REPORTING ON  
SPECIMENS OF BLOOD AND BLOOD PRODUCTS  
AGAINST HIV AND AIDS OF SURVEILLANCE OBJECTS COLLECTED  
FROM BLOOD-BORNE DISEASES**

**PERSONAL PROTECTION** When handling stains and/or blood or body fluids, use appropriate personal protective measures and use covering clothing and gloves. Wash hands with soap and water after the product.

**CONTROL** The flow surface is marked with a yellow line. Do not touch, deposit, or deposit the materials. Blood and other body fluids should be contained and a special record of local regulations to be followed.

**EFFECTIVE TESTS HAVE DEMONSTRATED THAT THIS PRODUCT IS A  
RELIABLE AND EFFECTIVE METHOD FOR THE DETECTION OF HIV  
INFECTION IN BLOOD AND BLOOD PRODUCTS (BLOOD AND  
BLOOD PRODUCTS) IN THE PRESENCE OF OBSCURE SOIL (S  
BLOOD SERUM)**

**PRECAUTIONARY MEASURES**

09/15/15  
SS

## K&K Neutro Quat Disinf Film Print

**APPROVED**

By Stepan at 9 16 am, May 29, 2015

PORTION POUCHES NEUTRO QUAT  
NEUTRAL DISINFECTANT CLEANER

ACTIVE INGREDIENTS	
Octyl decyl dimethyl ammonium chloride	15.24%
Dioctyl dimethyl ammonium chloride	7.62%
Didecyl dimethyl ammonium chloride	7.62%
Allyl (50% C14 40% C12 10% C16)	
dimethyl benzyl ammonium chloride	20.32%
INERT INGREDIENTS	49.20%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

**DANGER CORROSIVE**

See container label for additional  
precautionary statements and use directions  
EPA Reg No 1839 176 89885  
EPA Est No 88326 PA 001  
Distributed by K&K Chemical Company  
1303 Industrial Dr Royse City TX 75189  
Add 1 packet to 2 gallons of water  
Net Contents 0.8178 ounce

PORTION POUCHES NEUTRO QUAT  
NEUTRAL DISINFECTANT CLEANER  
Quaternary Ammonium Chlorides  
KEEP OUT OF REACH OF CHILDREN  
**DANGER CORROSIVE**  
See outer container for  
Precautions and Directions  
EPA Reg No 1839 176-89885



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07/15/15  
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## Excalibur Disinf Film Print

**APPROVED**  
By Stepan at 10 31 am May 20 2015

**WATER-SOLUBLE PAKS**  
**NEUTRAL DISINFECTANT CLEANER**  
**ACTIVE INGREDIENTS**  
Octyl decyl dimethyl ammonium chloride 15.24%  
Dioctyl dimethyl ammonium chloride 7.62%  
Didecyl dimethyl ammonium chloride 7.62%  
Alkyl (50% C14 40% C12 10% C16)  
dimethyl benzyl ammonium chloride 20.32%  
**INERT INGREDIENTS** 49.20%  
**TOTAL** 100.00%  
**KEEP OUT OF REACH OF CHILDREN**  
**DANGER CORROSIVE**  
See container label for additional  
precautionary statements and use directions  
EPA Reg No 1839-176-01643  
EPA Est No 88326-PA-001  
Mfg for EXCALIBUR  
P.O. Box 1059 1303 Industrial Dr. Royse City TX 75169  
Add 1 packet to 2 gallons of water  
Net Contents 0.8178 ounce

**WATER SOLUBLE PAKS**  
**NEUTRAL DISINFECTANT CLEANER**  
Quaternary Ammonium Chlorides  
**KEEP OUT OF REACH OF CHILDREN**  
**DANGER CORROSIVE**  
See outer container for  
Precautions and Directions  
EPA Reg No. 1839-176 91643



## Page 1 of 1

Page 1 of 1

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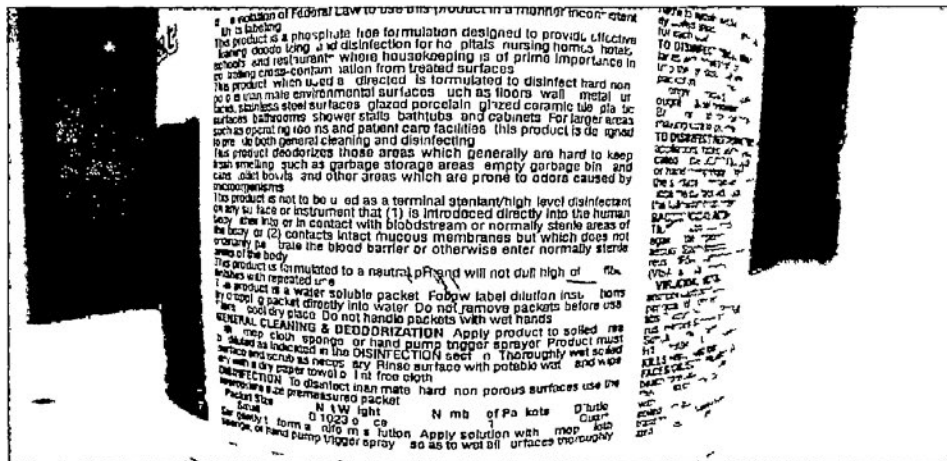


Photo exh 3 Showing first portion of partial view of product label



Photo exh 4 Showing middle portion of partial view of product label

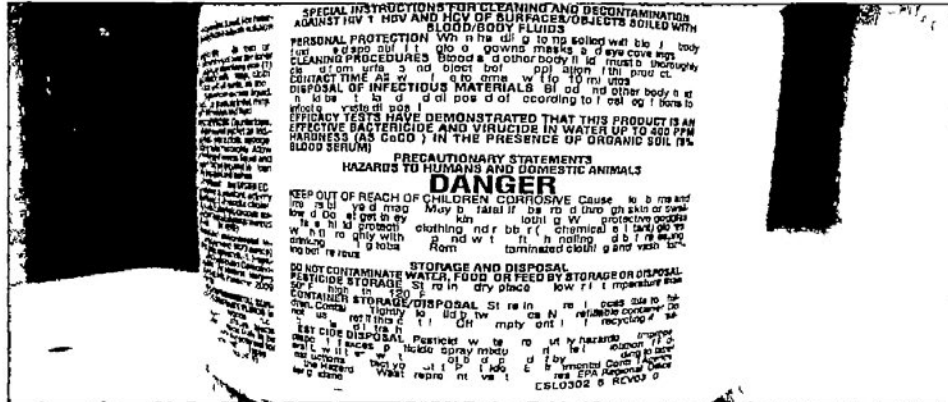


Photo exh 5 Showing last portion of product label

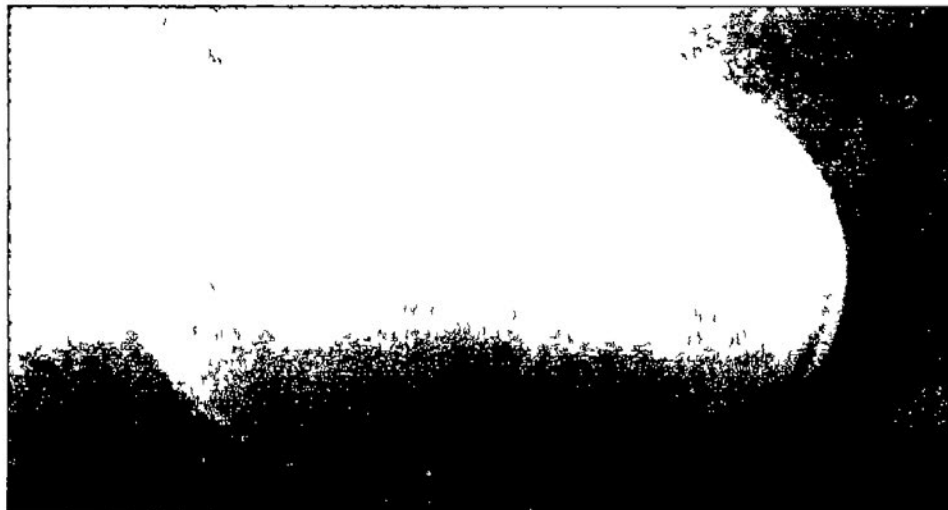


Photo exh 6 Showing top of product container



Photo exh 7 Showing bottom of container with lot# present 52451 first digit represents the year(5) the next 1 to 3 digits represent the day of the year(245) the last digit represents the machine which packaged the product(1) machine 1